

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE AIR CARGO SHIPPING
SERVICES ANTITRUST LITIGATION

MDL No. 1775

Master File 06-MD-1775 (JG) (VVP)

**STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DEADLINE FOR
PLAINTIFFS TO TAKE THE RULE 30(B)(6) DEPOSITION OF
CATHAY PACIFIC AIRWAYS**

WHEREAS the parties' Fifth Stipulated Revised Discovery and Class Certification Briefing Schedule (as ordered by the Court on March 6, 2013) set a deadline of December 31, 2013 by which fact discovery would end;

WHEREAS Plaintiffs served a Rule 30(b)(6) deposition notice on Cathay Pacific Airways ("Cathay Pacific") on November 27, 2013 to establish the foundation for admissibility of documents attached to the notice (the "Specified Documents");

WHEREAS the aforementioned Rule 30(b)(6) deposition is scheduled for December 30, 2013;

WHEREAS the Parties agree that the aforementioned Rule 30(b)(6) deposition may be rescheduled and conducted after December 31, 2013, as set forth below;

WHEREAS counsel for Cathay Pacific agrees to identify by January 31, 2014, any objections to the foundation for admissibility of the Specified Documents;

WHEREAS counsel for Plaintiffs and counsel for Cathay Pacific agree that the Parties will meet and confer and negotiate in good faith to resolve any disputes regarding the foundation for admissibility of the Specified Documents and will endeavor to reach an agreement without the need for a deposition;

WHEREAS the Parties have agreed that in the event a deposition remains necessary, that

the deposition will occur on or before May 31, 2014;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned, that:

The deadline for Plaintiffs to take the Rule 30(b)(6) deposition of Cathay Pacific (as noticed on November 27, 2013) is extended until May 31, 2014, but that the discovery deadline of December 31, 2013 as between these parties otherwise remains intact.

Dated: December 23, 2013

Respectfully submitted,

/s/ Brent Landau

Brent Landau
Michael Hausfeld
HAUSFELD LLP
1700 K Street, Suite 650
Washington, DC 20006
(202) 540-7200 (telephone)

/s/ Robert N. Kaplan

Robert N. Kaplan
Gregory K. Arenson
Gary L. Specks
KAPLAN FOX & KILSHEIMER, LLP
850 Third Avenue, 14th floor
New York, NY 10022
(212) 687-1980 (telephone)

/s/ Hollis L. Salzman

Hollis L. Salzman
Meegan Hollywood
ROBINS, KAPLAN, MILLER &
CIRESI L.L.P.
601 Lexington Avenue
Suite 3400
New York, NY 10022
(212) 980-7400 (telephone)

/s/ Howard J. Sedran

Howard J. Sedran
Austin B. Cohen
Keith Verrier
LEVIN, FISHBEIN, SEDRAN & BERMAN
510 Walnut Street
Philadelphia, PA 19106
(215) 592-1500 (telephone)

Interim Co-Lead Counsel

/s/ David H. Bamberger

David H. Bamberger

Deana L. Cairo

DLA PIPER LLP (US)

500 Eighth Street, N.W.

Washington, D.C. 20004

(202) 799-4000 (telephone)

(202) 799-5000 (facsimile)

Counsel for Cathay Pacific Airways Ltd.

So Ordered

Victor V. Pohorelsky

United States Magistrate Judge

Dated: _____